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July 25, 2022

Via ECF

Magistrate Judge Sarah Netburn
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 430
New York, NY 10007

Re: *Norris v. Goldner, et al.*
Case No. 19-cv-5491-PAE-SN

Dear Judge Netburn:

The parties submit this joint letter pursuant to Your Honor's Order dated July 21, 2022 (ECF No. 91).

The parties have met and conferred. Plaintiff's counsel has informed Defendants' that Plaintiff is available for his deposition, via Zoom or similar videographic means, on August 16, or August 18, 2022. Defendants' counsel has informed Plaintiff's counsel Mr. Goldner must consult his calendar and will provide his availability next week.

1. Plaintiff's Position Regarding Discovery.

Plaintiff's position is that there are no further discovery issues. We thank the Court for its continued time and attention to this matter.

2. Defendants' Position Regarding Discovery.

After discussing with our clients, it is Defendants' position that there is outstanding written discovery topics that have not been settled. As newly retained counsel, Defendants' are seeking permission to engage Plaintiff in written discovery.

Respectfully submitted,

/s/ Ryan Dolan

Ryan Dolan
Counsel for Defendants

/s/ Francelina M. Perdomo

Francelina M. Perdomo
Counsel for Plaintiff